

Ivan Mckinney#601321
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Trenton, N.J. 08625

U.S. DISTRICT COURT
NEW JERSEY
2019 JAN 24 A 2:52

U.S. District Court
New Jersey District
Hon. Judge Michael Hammer
50 Walnut Street
Newark, N.J. 07102

Mckinney v. Cuccinella
2:15-cv-07442

January 18, 2019

Your Honor,

Please accept this amended complaint I file in good faith to include Corp. Huergo in this complaint. I want to thank you for your time in this matter. This complaint is filed under U.S.C. 1983.

CC: Leonard Seaman

Sincerely Yours,
Ivan McKinney

1. On July 25, 2013 Corp. Jorge Huergo was the supervising officer in court room 403 in Bergen County courthouse.
2. This court room was run by Hon. Judge Guida
3. Plaintiff, Ivan Mckinney was being sentenced in that court on the above date
4. Towards the end of that proceeding plaintiff ask to speak after being sentenced.
5. The Hon. Judge Guida allowed plaintiff to speak.
6. Plaintiff excercised that right and began to chant I am Trevon Martin on several occasions
7. Hon. Judge Guida never told Corp. Huergo or Off. Savino to remove plaintiff from the court
8. Corp. Huergo and Off. Savino proceeded to assault plaintiff and remove him from the court.
9. Defendant's assaulted plaintiff in the presence of his family and others in the court.
10. The assault continued in the hallway on plaintiff.
11. Plaintiff sister was walking out the bathroom when the two was assaulting plaintiff.
12. Plaintiff sister begged and shouted stop hitting him.
13. While in the hallway OFF. James Conway was told by Corp. Huergo open the fuck--- door that led from the hallway unto the elevator.
14. While in the elevator both savino and Huergo continued beating plaintiff constantly.
15. Upon them taking me out the elevator they kept beating me all the way to the basement bull pen.

16. A Hispanic prisoner had witness the beating down by the bullpen. He told plaintiff a while later when he saw him.

17. Defendant's injured plaintiff neck and shoulder area causing severe pain and injury.

18. Plaintiff went to the medical department as soon as he went back to the Bergen county Jail.

Cruel and Unusual Punishment

In violation of the 8th amendment Corp Huergo purposely, willfully, and blatantly assaulted plaintiff along with Off. Savino.

Corp. Huergo conduct was with malice, reckless disregard, with intent to injure plaintiff.

Equal Protection Rights

21. Corp. Huergo also violated plaintiff 14th amendment rights by subjecting him to a beating that was not done to other prisoners.

22. Defendants Huergo and Savino's conduct was willful intent there fore stripping any defense of immunity

23. Off. savino has already been served in this complaint and now plaintiff is asking this court to amend Corp. Huergo in it also.

24. On October 25, 2018 counsel for Off . Savino Leonard Seaman ESQ. provided plaintiff with Corp. Huergo's information as-per this court's order.

Plaintiff request trial by jury

Plaintiff request declaratory relief at the courts judgement

plaintiff request compensatory at the courts judgement

Plaintiff request punitive damages in the amount of 200,000

January 18, 2019

Sincerely yours,
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Legal

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